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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Parts 2, 21, 25 and 94
of the Commission's Rules to
Accommodate Common Carrier
And Private Op-Fixed Microwave
Systems in Bands Above 3 GHz

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) RM-8004
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COMMENTS OF MICROWAVE RADIO CORPORATION

Microwave Radio Corporation ("MRC") submits these comments in support of the above-captioned petition for rulemaking submitted by Alcatel Network Systems, Inc.

MRC believes that the Commission must allocate additional spectrum for the use of Part 94 private microwave users. A decade ago, the Commission reallocated the 12.2-12.7 GHz band from the private microwave service to the broadcasting satellite service. While it offered a procedure to accommodate those Part 94 users that were forced out of 12.2-12.7 GHz, the Commission did not allocate any additional spectrum for Part 94 users.

Now we see the same thing happening. The Commission has proposed to reallocate the private microwave spectrum in the 1850-2200 MHz range from the private microwave service to

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“emerging technologies.”¹ The Commission’s proposal talks about relocating existing 2 GHz microwave users in other bands,² but does not propose to allocate any additional spectrum to meet the future needs of private microwave users.

The private microwave bands at 2, 6 and 12 GHz support relatively long path length applications.³ A decade ago, the total amount of spectrum in the Part 94 bands at 2, 6 and 12 GHz was 1030 MHz. By eliminating the 12.2-12.7 GHz band, this was decreased to 530 MHz. The proposed elimination of 1850-1990, 2130-2150 and 2180-2200 MHz would cut this to 350 MHz. This is not adequate to support the future needs of the private microwave service.

We support the Alcatel petition because it proposes to allocate bands at 3700-4200 MHz, 5925-6425 MHz and 10.7-11.7 GHz to the private microwave service. This would add a substantial amount of spectrum capable of supporting relatively long path length needs. These bands are currently used by the common carrier microwave service. Alcatel does not propose to take these bands away from common carriers, nor would we support such a proposal.

Adding these three bands to Part 94 would serve the public interest. It would provide spectrum to satisfy private microwave needs without depriving common carriers of access to these bands if needed.

¹Notice of Proposed Rulemaking in ET Docket No. 92-9.

²Id. at para. 22.

³In contrast, the Part 94 bands at 18 and 23 GHz support relatively short path length needs.

These microwave bands at 4, 6 and 11 GHz are no longer essential to common carriers. Common carriers have devoted the bulk of their network expansion efforts to the deployment of fiber optics communications systems. This is well documented in the Common Carrier Bureau's periodic Fiber Deployment Studies and in recent NTIA studies.⁴ Consequently, they may be unable to argue that sharing these bands with private microwave users will deprive them of capacity they need for service to their customers.

Private microwave uses and common carrier microwave uses are operationally similar and administratively compatible. They use the same technology and carry the same kinds of traffic. There is no reason that they should not be permitted to share the same frequency bands. In particular, there is no reason that private microwave users should not be permitted to share the 4, 6 and 11 GHz common carrier bands.

Our comments today address only the allocation proposal submitted by Alcatel, not the proposed channel plan. Choice of the best channel plan requires a consideration of frequency coordination requirements. We will address these details when the Commission issues a Notice of Proposed Rulemaking.

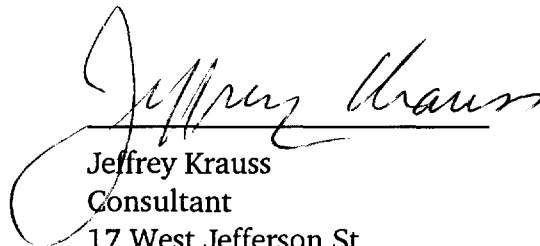
⁴Issues in Domestic Telecommunications: Directions for National Policy (NTIA Pub 85-16, July 1985) at p. 18; NTIA Telecom 2000 (NTIA Pub 88-21, October 1988) at pp. 259-267.

In light of the above, we support the Alcatel request that the Commission begin a rulemaking proceeding to allocate additional spectrum to the private microwave service. We specifically support the Alcatel proposal that current and future private microwave users should be eligible to use the 4, 6 and 11 GHz bands, and that these bands should be added to Part 94.

Respectfully submitted,

A handwritten signature in cursive script, reading "Fred Collins Jan".

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A handwritten signature in cursive script, reading "Jeffrey Krauss".

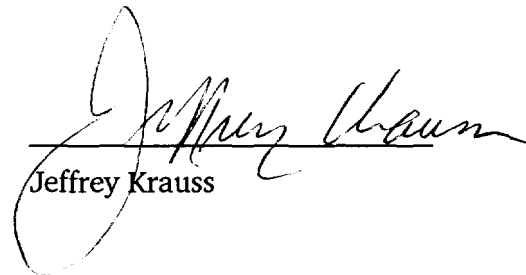
Jeffrey Krauss
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Date: July 2, 1992

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 1992, I mailed a copy of the foregoing Comments of Microwave Radio Corporation via first class postage prepaid mail to the following:

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Jeffrey Krauss